

U.S. NAVY VETERANS' GOOD GOVERNMENT FUND

-NAVPAC-

1628 East 17th Avenue
Tampa FL 33605
(813) 274-4970

RECEIVED
FEC MAIL
OPERATIONS CENTER

2005 APR 21 A 8:53



<http://NavPac.tripod.com>
email: navpac2000@yahoo.com

April 12, 2005

FEC

Attn: Mr. Bradley Decker
Washington DC 20463

Re: Your letter dated April 6, 2005 (copy attached);
Amended 3X

Dear Mr. Decker:

Upon re-review of the underlying facts concerning the referenced expenditures, and the difficult to understand meaning of the word "agent" in 11 CFR §109.21,* the Committee has determined that these expenditures were independent expenditures and not coordinated communication expenditures.

Upon further review of Committee "writings" concerning these expenditures, with respect to the application of §110.2(b)(4) and §110.2(b)(2)(ii), the Committee also finds that Committee writings** did not meet any test of the former for designation (i.e. there was no designation in writing as to which election the expenditures were for) and that, under the latter, the expenditures should have been classified as applying to the next subsequent primary, and not to the general.

We have amended, enclosed, the pertinent pages of the referenced 3X.

The Committee is, you realized, a multicandidate committee.

* The Committee notes that the Shays District Court (CV02-1984) found the same difficulty, but denied plaintiffs' request to enjoin enforcement. This does not mean, however, in a hypothetical action for enforcement of the FEC's interpretation of §109.21 that a District Court would not dismiss on grounds the section violated Chevron, the APA, or was otherwise void for vagueness.

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** The communication itself merely said that the Committee had endorsed Bush/Cheney '04.

Sincerely,



Bill Meyers
Treasurer

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 6, 2005

Bill Meyers, Treasurer
U.S. Navy Veterans' Good Government Fund
(NAVPAC)
1628 E 17th Ave
Tampa, FL 33605

**Response Due Date:
May 6, 2005**

Identification Number: C00348128

Reference: April Quarterly Report (1/1/04 - 3/31/04)

Dear Mr. Meyers:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B discloses one or more contributions totaling \$3,226.29 towards the general election campaign of a Presidential candidate. Please note that contributions to Presidential candidates are governed by specific regulations. Please refer to the following explanation of Presidential election financing.

All Presidential primary elections held during an election year are considered one election for the purpose of the contribution limits. A multicandidate committee, therefore may give only \$5,000 to a Presidential candidate's primary campaign, regardless of how many separate state Presidential primaries the candidate participates in, while a non-multicandidate may give only \$2,000. 11 CFR §§110.1(j)(1) and 110.2(i)(1)

In the general election, contributions to Presidential campaigns are not permitted if the candidate receives public funds. (An exception: Political committees may contribute to a publicly funded Presidential nominee's "compliance fund." A compliance fund is used solely for legal and

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accounting expenses incurred in complying with the election law. Gifts to compliance funds are considered contributions and are subject to usual per-candidate, per-election limits.) 11 CFR §9003.3(a)

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an impermissible contribution, you must request a refund within 60 days of the treasurer's receipt.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund of the contribution will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1301.

Sincerely,



Bradley Decker

Campaign Finance Analyst
Reports Analysis Division

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

U.S. NAVY VETERANS' GOOD GOVERNMENT FUND
(NAV PAC)

ADDRESS (number and street)

1628 E. 17TH AVE.



Check if different
than previously
reported. (ACC)

TAMPA

FL

33605

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00348128

3. IS THIS
REPORT



NEW
(N)

OR



AMENDED
(A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:



April 15
Quarterly Report (Q1)



July 15
Quarterly Report (Q2)



October 15
Quarterly Report (Q3)



January 31
Year-End Report (YE)



July 31 Mid-Year
Report (Non-election
Year Only) (MY)



Termination Report
(TER)

(b) Monthly
Report
Due On:



Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)



Nov 20 (M11)
(Non-Election
Year Only)



Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)



Dec 20 (M12)
(Non-Election
Year Only)



Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:



Primary (12P)



General (12G)



Runoff (12R)

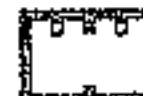


Convention (12C)



Special (12S)

Election on



in the
State of



(d) 30-Day
POST-Election
Report for the:



General (30G)



Runoff (30R)



Special (30S)

Election on



in the
State of



5. Covering Period

01

01

2004

through

03

31

2004

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

BILL MEYER

Signature of Treasurer

Bill Meyer

Date

04

11

2005

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only

FEC FORM 3X
(Rev. 02/2003)

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share		
(ii) Non-Federal Share.....		
(b) Other Federal Operating Expenditures	94745	94745
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	94745	94745
22. Transfers to Affiliated/Other Party Committees.....		
23. Contributions to Federal Candidates/Committees and Other Political Committees.....		
24. Independent Expenditures (use Schedule E)	1361934	1361934
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F)		
26. Loan Repayments Made.....		
27. Loans Made.....		
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs).....		
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....		
29. Other Disbursements		
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share		
(ii) "Levin" Share		
(b) Federal Election Activity Paid Entirely With Federal Funds		
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b))....		
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	1456678	1456678
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	1456678	1456678

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 2 OF 2
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) (NAVPRC)
U.S. NAVY VETERANS' GOOD GOVERNMENT FUND

FEC IDENTIFICATION NUMBER ▼

C00348128

Check if ☐ 24-hour notice ☐ 48-hour notice

Full Name (Last, First, Middle Initial) of Payee

LYCOS INC.

Mailing Address

115 5TH AVE. STE. 200

City

NEW YORK

State

NY

Zip Code

10003

Date

03 / 31 / 2004

Amount

1500

Purpose of Expenditure

Internet Hosting Fee

Category/
Type

004

Office Sought:

☐ House

State: _____

☐ Senate

District: _____

☒ President

Check One:

☒ Support

☐ Oppose

Name of Federal Candidate Supported or Opposed by Expenditure:

GEORGE W. BUSH/DICK CHENEY

Calendar Year-To-Date Per Election
for Office Sought

1500

Disbursement For:

☒ Primary

☐ General

☐ Other (specify) _____

Full Name (Last, First, Middle Initial) of Payee

AMERICAN PRINTING USA INC.

Mailing Address

BOX 1320

City

GIBSONTON

State

FL

Zip Code

33534

Date

03 / 31 / 2004

Amount

321189

Purpose of Expenditure

Flyer & Brochures Printing/Mailing Svcs.

Category/
Type

004

Office Sought:

☐ House

State: _____

☐ Senate

District: _____

☒ President

Check One:

☒ Support

☐ Oppose

Name of Federal Candidate Supported or Opposed by Expenditure:

GEORGE W. BUSH/DICK CHENEY

Calendar Year-To-Date Per Election
for Office Sought

322689

Disbursement For:

☒ Primary

☐ General

☐ Other (specify) _____

(a) SUBTOTAL of Itemized Independent Expenditures.....▶

1260433

(b) SUBTOTAL of Unitemized Independent Expenditures.....▶

101501

(c) TOTAL Independent Expenditures.....▶

1361934

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature

[Signature]

TREASURER

Date

04 / 11 / 2005

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered Date of Receipt

☐ USPS First Class Mail Postmarked

☒ USPS Registered/Certified Postmarked (R/C)
4/12/05

☐ USPS Priority Mail Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label ☐

☐ USPS Express Mail Postmarked

☐ Postmark Illegible

☐ No Postmark

☐ Overnight Delivery Service (Specify): Shipping Date
Next Business Day Delivery ☐

☐ Received from House Records & Registration Office Date of Receipt

☐ Received from Senate Public Records Office Date of Receipt

☐ Received from Electronic Filing Office Date of Receipt

☐ Other (Specify): Date of Receipt or Postmarked


PREPARER
(3/2005)

4/21/05
DATE PREPARED

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